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Memorandum

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To: William Caton
Federal Communications Commission

From: Makysa Moton
Wireline Competition Bureau
Telecommunications Access Policy Division

Date: November 14, 2005

Re: Docket Entry Request

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Federal Communications Commission
Office of the Secretary

Please enter the attached document into **CC Docket Nos. 96-45, 02-6** and **WC Docket Nos. 02-60 and 03-109**. If you have any questions, please feel free to contact me (202) 418-7404.

Thank You,


Makysa Moton

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Federal Communications Commission
Office of the Secretary

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WIRELINE COMPETITION BUREAU

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Federal-State Joint Board
On Universal Service

Schools and Libraries Universal Service Support Mechanism

Rural Health Care Support Mechanism

Lifeline and Link-Up

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) CC Docket No. 96-45
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) CC Docket No. 02-6
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) WC Docket No. 02-60
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) WC Docket No. 03-109

To: The Commission

**PETITION FOR DESIGNATION AS A TEMPORARY
ELIGIBLE TELECOMMUNICATIONS CARRIER TO
PROVIDE KATRINA LIFELINE ASSISTANCE**

Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless") submits this petition for designation as a temporary Eligible Telecommunications Carrier ("ETC") for the purpose of providing assistance to qualified customers affected by Hurricane Katrina.¹ Verizon Wireless applauds the Federal Communications Commission for its multiple actions to provide emergency communications relief to customers who were harmed and dislocated by Hurricane Katrina. Verizon Wireless understands that participation in the Katrina Lifeline program is voluntary and

¹ Verizon Wireless submits this petition pursuant to the *Order*, Federal-State Joint Board on Universal Service, CC Docket No. 96-45, FCC 05-178, (rel. October 14, 2005) ("Katrina Relief Order"). Consistent with the Katrina Relief Order, Verizon Wireless does not seek to be deemed an ETC for any other Universal Service support mechanism, or pursuant to the Section 214 ETC designation process. It is thus not seeking authorization from any state that administers its own ETC programs or submitting to any obligations that those states may impose on ETC providers. Verizon Wireless seeks authority from the FCC solely to provide temporary Lifeline assistance to customers displaced by Hurricane Katrina.

will offer the services identified below in targeted areas following approval from the Commission.

I. Service Offering

Verizon Wireless seeks authority to offer eligible customers the following Katrina Lifeline Plan:

(1) a GPS enabled handset for prepaid service of Verizon Wireless' choice, including but not limited to the Kyocera KX414, the Nokia 2128ipp, the Nokia 6015i or the Samsung a650 or another comparable pre-paid capable handset. Phones will be provided with a battery charger and a standard battery;

(2) 300 minutes of pre-paid service usable for 120 days from the date of activation.

Eligible customers will receive this pre-paid capable handset and pre-paid service at no charge and will not be subject to any contractual obligations.² The Katrina Lifeline Plan will expire in 120 days after activation or when the 300 minutes are exhausted, whichever is earlier. Customers will have the option to purchase additional pre-paid minutes and services at regular retail prices through Verizon Wireless' standard consumer pre-paid plans after they activate their Katrina Lifeline Plan.³ If a customer subsequently purchases pre-paid services under a Verizon Wireless standard pre-paid plan, any unexpired Katrina Lifeline Plan minutes will be applied to the standard pre-paid plan.⁴ Verizon Wireless intends to offer the Katrina Lifeline Plan only on a

² Verizon Wireless will be reimbursed by the Universal Service Administration Company \$130 for each eligible customer to whom Verizon Wireless provides the Katrina Lifeline service offering.

³ After the Katrina Lifeline Plan service expires, customers will be able to purchase service under either Verizon Wireless' Easy Pay or Inpulse offerings, both of which will work with the handset provided in the Katrina Lifeline Plan.

⁴ Any carried-over Katrina Lifeline Plan minutes will be used first under the new pre-paid plan.

targeted geographic basis to customers who reside in eastern Texas,⁵ Louisiana, Mississippi and Alabama at the time they submit their applications.⁶

II. Eligibility Requirements

Verizon Wireless will offer the temporary Katrina Lifeline Plan to customers who meet the following eligibility requirements and submit a request prior to March 1, 2006:

- (1) Customers must certify they were residents of Counties in Louisiana, Mississippi and Alabama designated by the Federal Emergency Management Agency ("FEMA") as eligible for individual assistance related to Hurricane Katrina;⁷
- (2) Customers must certify that they are designated by FEMA as eligible for disaster housing assistance without repayment obligations and must attach a copy of their FEMA eligibility letter from the Individuals and Households Program (IHP) demonstrating their approval for disaster housing assistance.⁸
- (3) Customers must certify that they are the head of their household, and that their household is receiving only one Katrina Lifeline special support package;⁹
- (4) Customers must reside at the time they submit their application in areas of Louisiana, Mississippi, Alabama or eastern Texas where Verizon Wireless is licensed and provides service;
- (5) Customers must submit an application for a Katrina Lifeline Plan postmarked on or before March 1, 2006.

⁵ Eastern Texas includes all licensed markets except El Paso.

⁶ Verizon Wireless operates under numerous FCC licenses in Texas, Mississippi, Louisiana and Alabama. Verizon Wireless certifies that it will provide this service only in areas where it is licensed to provide service.

⁷ See Katrina Relief Order at 2, n.3.

⁸ The FCC has not identified any documentation that would confirm that a customer does not have a repayment obligation. Verizon Wireless will require customers to certify that they do not have a repayment obligation for the FEMA individual housing assistance.

⁹ Consistent with the Katrina Relief Order, if a household is separated geographically due to Hurricane Katrina, there can be more than one qualifying head of household for a family. Moreover, if more than one household is residing at the same address, there can be more than one head of household at that address. Customers will have the opportunity to demonstrate such exigent circumstances through the application form.

III. Public Outreach

Verizon Wireless will publicize the availability of the Katrina Lifeline Plan through multiple outlets. Upon receiving FCC authorization to provide the Katrina Lifeline Plan, Verizon Wireless will reach out to customers through media press releases and events in the media markets serving Louisiana, Mississippi, Alabama and Texas. Verizon Wireless also will publicize and provide information about the Katrina Lifeline offering to customers through the Verizon Wireless web site, VerizonWireless.com, as well as through customer information notices and brochures in our retail stores. Verizon Wireless will implement a special 800 number, staffed by specially trained employees, for customers to call for information on Verizon Wireless' Katrina Lifeline Plan and to request a Katrina Lifeline Plan application.

IV. Fraud Prevention

Verizon Wireless will protect against fraud by implementing a centralized distribution center for the Katrina Lifeline handsets and prepaid service. Customers who believe they are eligible for the Katrina Lifeline Plan can receive an application by calling a designated Verizon Wireless 800 number. To apply for the Katrina Lifeline Plan, customers will fill out an application that identifies their previous residential address in the Katrina affected area, their current address, their social security number and the required certifications (identified above) and will submit the application and FEMA eligibility letter to a Verizon Wireless centralized service center.¹⁰ After verifying that a customer meets the eligibility requirements and has not

¹⁰ Verizon Wireless will retain copies of each customer's FEMA eligibility letter and application (which will include the customer's certifications) for three years. Verizon Wireless understands that these are the only customer documents that it will need to retain for purposes of an audit from the FCC or USAC.

already received the benefit from Verizon Wireless,¹¹ Verizon Wireless will send eligible customers a prepaid handset with 300 minutes of use pre-programmed into the handset.

V. Implementation and Launch

Given the need to utilize an automated system to provide for tracking and to protect against fraud, Verizon Wireless will need approximately 14 days from the date of approval of this petition to provision an automated fulfillment and tracking system for this new program. Verizon Wireless will endeavor to bring the 800 number on line within one week of approval of this petition for purposes of providing customer information and sending and receiving customer applications and certifications.

¹¹ Verizon Wireless will require each head of household to certify that his/her household has not received another Katrina Lifeline support offering from Verizon Wireless or any other carrier. Verizon Wireless will confirm that an applicant has not already received a Katrina Lifeline Plan from Verizon Wireless before providing a Katrina Lifeline Plan to the applicant. However, Verizon Wireless will not have any way to confirm that a customer has not received a Katrina Lifeline offering from another wireless carrier. Verizon Wireless understands that if audited by the FCC or USAC, it will not be responsible for customer misrepresentations, including, but not limited to, possible misrepresentations relating to receipt of a Katrina Lifeline benefit from another carrier.

VI. Certification

Verizon Wireless certifies that it intends to offer the Katrina Lifeline Plan to qualifying customers pursuant to Katrina Relief Order and consistent with the service and geographic limitations identified above. Verizon Wireless is committed to helping residents who endured hardship and dislocation from Hurricane Katrina gain access to communications while they rebuild their lives. Verizon Wireless seeks temporary ETC designation solely to provide targeted, emergency relief to residents in the most impacted areas.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A
VERIZON WIRELESS

By:

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a horizontal line underneath the name.

John T. Scott, III
Vice President and Deputy General
Counsel – Regulatory Law

Anne E. Hoskins
Senior Counsel

1300 I Street, N.W., Suite 400-W
Washington, D.C. 20005
(202) 589-3760

Dated: November 3, 2005